

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SURINDER S. BRATCH,

Plaintiff.

v.

EQUIFAX INFORMATION SERVICES LLC
AND EXPERIAN INFORMATION
SOLUTIONS, INC.

Defendant(s).

Case No. CV 09-1724 RSM

MOTION TO EXTEND DEADLINES

NOTE ON MOTION CALENDAR:
AUGUST 20, 2010

MOTION TO EXTEND TIME

Petitioner Surinder S. Bratch ("Plaintiff"), by and through his undersigned counsel, hereby moves the Court to extend the current deadlines for trial, discovery, and other deadlines by three months.

1. The parties are in the process of re-filing a Stipulated Protective Order which will allow Defendants to produce material that they have withheld from the Plaintiff due to claims of confidentiality. Experian produced initial discovery in May 2010 and Equifax produced in late July 2010, but both Defendants withheld a number of documents due to their assertion they needed a Protective Order, which the Court declined to sign on August 9, 2010. The parties have re-worked the stipulated order, but the delay only prolongs delivery of the discovery Defendants

1 have yet to produce, and this discovery is imperative for Plaintiff's case. In addition, Plaintiff is
 2 in the process of coordinating discovery conferences with both Defendants regarding additional
 3 discovery disputes.

4 2. The current schedule does not provide reasonable opportunity for Plaintiff to
 5 review the documents that will be produced under the Protective Order and those to be produced
 6 after discovery conference, and conduct depositions and engage in other discovery activities
 7 within the current deadlines.

8 3. Following the production of documents pursuant to the Protection Order,
 9 Plaintiff's expert will require at least one month, and up to three months to review the documents
 10 and prepare a report.

11 4. Plaintiff also anticipates taking depositions of the Defendants in this case and
 12 those have not yet been completed due to the delay in obtaining relevant documents from the
 13 Defendants.

14 5. Therefore Plaintiff is asking for a three month continuance of the Trial date and
 15 other deadlines:
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17	Trial Date	May 7, 2011
18	Report from Expert witnesses under FRCP 26(a)(2)	November 11, 2010
19	Discovery Completion	January 12, 2010
20	Dispositive Motion Filing Deadline	February 9, 2010
21	Mediation under CR 39.1(c)(3)	March 27, 2010
22	Limine Motion Filing Deadline	April 10, 2011
23	Pretrial Order	April 26, 2011
24	Trial briefs, proposed voir dire questions, proposed jury instructions, and	May 2, 2011
25	trial exhibits	
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1 WHEREFORE, Surinder S. Bratch motions the Court to extend the trial date and
2 corresponding deadlines, as herein requested.

3 DATED this 12th day of August, 2010.

4 SEATTLE DEBT LAW, LLC

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6 /s/ Christina Latta Henry
7 Christina Latta Henry, WSBA# 31273
8 Attorney for Debtor
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